

Shoebrooks, Jeff and Robin
Winchester, KY
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Comment No. 1
Comment noted.

Issue Code: 16



Kentucky Pioneer Integrated Gasification
Combined Cycle Demonstration Project
Draft Environmental Impact Statement
U.S. Department of Energy
National Energy Technology Laboratory

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Written Comment Form

Must be received by January 4, 2002.

Date 1/3/02

Dear Mr. Spears,

I am writing this letter to state my opinion
against the planned Combined Cycle Project slated
for Trapp, KY. I am a registered nurse and work
for the Veterans Hospital in Lexington, KY. I have
a wife, daughter 11 yrs. old, son 8 years, and infant twins.
We have lived in Winchester KY for six years
after moving from Lexington, KY. We moved to get
away from the city and the traffic. We both
longed to live in a smaller town, closer to the
country, as I grew up.

Recently, we found the property we have
longed dreamed for. We sold our house in
downtown Winchester and bought a home in the
country with five acres. After moving I heard

1/16

Comment forms may be mailed to:
Mr. Roy Spears
U.S. Department of Energy
National Energy Technology Laboratory
3610 Collins Ferry Road
Morgantown, WV 26507-0880

Comment forms may be faxed to:
Mr. Roy Spears
(304) 285-4403

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about this planned electricity plant but was
unable to attend the public discussion due to
work. We now live at 366 Old Ruckersville Rd.
Winchester. The serenity and peace of this property
is hard to find in this area. It was a
dream come true for us to raise our children
in this setting and experience life to the fullest
as our parents did. The wildlife is wonderful
and the previous owner was a wildlife photographer.
He catalogued all the wildlife species and we
have attached this list for your viewing.

Now, as I learn more about this proposed
project I am saddened to think of how our
lives will be affected. My son will attend
Shipp elementary school which is about 2 1/2

Please use other side if more space is needed.

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Comment No. 2

Issue Code: 08

DOE appreciates the provided list of wildlife species in the project area. Section 4.9, Ecological Resources, of the EIS provides information regarding species that are typically found in the region as well as special interest species. Section 5.9, Ecological Resources, provides an assessment of impacts to species common to the region and special interest species. The submitted list of wildlife species will be retained for reference in the project administrative record.

2/08

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miles from our house. The roads leading to this area consist of 2 lane curves, no guard rails, steep hillsides with creeks running along side. It is a dangerous road (Highway 89) leading from downtown Winchester to Tapp. Just last week an ice storm hit the area hard with no warning. As I was coming to work that morning I witnessed numerous accidents on this road. One such accident was a fire engine in the ditch at the bottom of the hill. It couldn't stop due to the steep decline leading out of Winchester. The planned arterial route leading from I-64 to Tapp would travel over railroads, bridges, through 2 school zones with crossings and a largely 35 mph/hr area with numerous houses sitting practically on the road.

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Comment No. 3

Issue Code: 10

Comment noted. Solid waste would be transported to landfills via trucks. An Emergency Response Plan, which documents procedures for providing emergency response and cleanup for any project related spills during materials transport, has not yet been developed by KPE. The plan will be developed during the engineering and construction phase of the project and would adhere to local, state, and federal regulations. Section 5.11, Traffic and Transportation, has been revised to discuss the Emergency Response Plan.

4/03

Comment No. 4

Issue Code: 03

The commentor's concern regarding the potential for impacts to any cultural resources in the vicinity of downtown Winchester has been addressed as part of the consultation with the Kentucky Heritage Council. The Section 106 Review process has been completed and the Kentucky SHPO has issued a finding of no effect on historic properties from this project.

3/10

3/10
(cont.)

Chapter 4 has been revised to clarify that impacts to the entire Area of Potential Effect have been addressed as part of the Section 106 process.

Comment No. 5

Issue Code: 06

Comment noted. As detailed in Table 5.7-3 of the EIS, maximum air quality impacts from the proposed project would be less than 1 percent of the relevant federal air quality standards for gaseous pollutants such as NO_x, SO₂, and CO. Maximum impacts of the proposed project on PM₁₀ concentrations would be less than 4 percent of the federal 24-hour PM₁₀ standard and less than 1.5 percent of the federal annual average PM₁₀ standard. As noted in the EIS, the carbon content of the syngas is expected to be less than that of natural gas. Consequently, greenhouse gas emissions from the proposed project would be less than from a comparable facility using natural gas.

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There are also 2 truck entrances (a large Sylvan
plant). The semi tractor trailer trucks would have
to travel through downtown historic Winchester,
across main street. This is all within a 4.5
mile distance from the interstate just to my house.
These dirty, dangerous trucks which disintegrate many
people's lives and pose a hazard to everyone
who travels these roads.

Secondly, as I read your government web
pages to try to understand what the plant would
entail, I have become alarmed at the
pollutants and possible carcinogens that would
be released from the smoke stacks into the air.
As the government site states "with the President's
Clean coal power initiative a new era exists for clean

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Comment No. 5 (cont.)

Issue Code: 06

Table 5.7-4 of the EIS identifies estimated maximum downwind concentrations of hazardous pollutants expected to be emitted by the proposed facility and the associated maximum lifetime cancer risks. Most of these compounds (all except benzene, carbon disulfide, carbonyl sulfide, formaldehyde, and hydrogen sulfide) would be associated with PM₁₀ emissions. Dispersion modeling conducted for the PSD/Title V Permit application indicates that the location of maximum 24-hour average and maximum annual average PM₁₀ concentrations would be within 0.8 kilometers (0.5 miles) of the facility, within the boundaries of the J. K. Smith Site property. PM₁₀ concentrations (and consequently most hazardous air pollutant concentrations) beyond the boundaries of the J. K. Smith Site property would be less than the maximum values. The area of maximum annual average concentration for gaseous emissions would be about 9.1 kilometers (5.7 miles) downwind of the facility.

3/10
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(cont.)

5/06

Section 5.7 of the EIS, Air Resources, has been revised to discuss the general downwind distances to areas of maximum pollutant impact.

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high potential, but still high risks. Transition to
move out of the lab and pilot scale development and into
major engineering tests as a precursor to commercial
use. Also stated "Each project is intended as a first
of its kind test of different gasifiers, cleanup systems
and applications". Can the release of CO₂, methane, nitrous
oxide, and mercury not have local environmental as
well as global impacts? This all seems a bit scary
to me and my family living in close proximity
to such "high risk, tests". Can we assume no
adverse effects will affect the people and wildlife
surrounding this area?

Does anyone, including Governor Patton think
that by "relocating" this plant from Illinois
this is really a good move for the people of Kentucky?

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Comment No. 6

Issue Code: 11

No impacts to health and safety of the general public would be expected from the operation of the proposed facility. Wastes generated at the plant would be managed in accordance with applicable state and federal regulations. Air and wastewater permits would limit these emissions to protect the public health and safety as well as the environment.

The gasification process would produce a small amount of wastewater containing primarily dissolved salts. Emissions would be primarily from the CT engines and cooling towers (see Table 5.7.3 of the EIS). Dispersion modeling conducted for the PSD/Title V Permit application covered an area about 12 kilometers (7.5 miles) from the project site, including the area of maximum air quality impact. Incremental ambient air quality impacts from the proposed project would be a very small fraction of the relevant federal and state ambient air quality standards (less than 1 percent for gaseous pollutants such as nitrogen dioxide, sulfur dioxide, and carbon monoxide and less than 4 percent of the federal 24-hour PM₁₀ standard). Total heavy metal deposition in areas downwind of the project would be much less than 1.1 kilogram per hectare (1 pound per acre) accumulated over 20 years.

Therefore, the overall increase in air emissions due to operation of the plant would be very low and present little risk to human health and the environment. Possible public health effects that could occur as a result of fire or a natural gas explosion would be minimized through basic facility design considerations.

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I think not! Not only are you planning on
 contaminating our area with pollutants but the
 electricity is planned for use outside of Kentucky.
 No local benefit will be derived from this
 endeavor. Is the bottom line money for the
 state? Surely there are alternatives for selecting
 to a less populated area. As a registered
 Republican who helped vote Mr. Bush into office,
 I am behind the president in finding new fuel
 technologies but I cannot back this project as
 it is planned. Why bring it out of state then
 to Kentucky? Don't we have our own to get rid of?
 Since I am playing catch up to these developments
 I will be pursuing every possible action with
 my fellow citizens, friends, neighbors, and family to
 Please use other side if more space is needed

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Comment No. 7

Issue Code: 08

Based on the impacts analysis in the Draft EIS, Sections 5.7 through 5.9, and 5.12 and 5.13, potentially adverse impacts to wildlife would be minimized or avoided through the project design, implementation of various management plans, and compliance with permit conditions. By design, there would be no discharges into the groundwater and surface water discharges would be regulated by KPDES permit. Prior to surface discharge, pollutant loads on the river would be examined and discharge limits established to protect water quality. An SPCC plan would be in place prior to operation. This plan would set forth a series of response activities that would reduce or avoid potential impacts to groundwater and surface water during a spill event. The terms and conditions set forth in Air Quality Permit Number V-00-049 specify operational limitations and conditions, including monitoring and testing requirements that regulate the emission of air contaminants. The air permit is based on a high level of sulfur removal and recovery from the syngas stream prior to its use. The air permit application included an assessment of air toxics and a screening evaluation of risk from possible stack emission constituents. The Kentucky Department of Air Quality determined that this risk was insignificant and that no further evaluation was required. While this evaluation is specific to human health concerns, it is an additional indicator for a low probability of adverse impacts to wildlife. Additionally, a component of the air quality permit includes a Phase II Acid Rain Permit. Adherence with permit conditions would limit air pollutant emissions in the local area and reduce the likelihood of adverse impacts to both plants and animals. Prior to plant operation, the effluent temperature of discharges into the Kentucky River would also be established and regulated to minimize impacts to the aquatic organisms.

9/16

8/22
(cont.)

10/16

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oppose this development
I appreciate your time and willingness to
listen to our concerns. Hopefully you and your
colleagues will see the human side to this
and the people whose lives will be affected.
I'm sure you could not want this in your
backyard. Also, I don't think President Bush
would like this located within miles of his
Texas ranch.

From me and my family, please reconsider
before proceeding

Sincerely,

Jeff Shoebrooks

JEFF ROBIN SHOEBROOKS
365 Old Buckenille Rd.
Winchester, KY 40391

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Comment No. 8

Issue Code: 22

Comment noted. The benefits associated with the proposed project are increased tax revenues for the State of Kentucky and additional jobs.

Comment No. 9

Issue Code: 16

The purpose of this EIS is to evaluate public and environmental impacts caused by the proposed project. DOE will consider the information provided in the EIS and public comments in this decision process. Chapter 2 discusses EKPC's 1998 Power Requirements Study which indicates that the electrical load for the region is expected to increase by 3.0 percent per year through 2017. Net winter peak demand is expected to increase by 3.3 percent per year and net summer peak demand is expected to increase by 3.0 percent per year. Peak demand is expected to increase from 2,031 MW in 1998 to 2,394 MW in 2003 and 3,478 MW in 2015. Based on this load growth, EKPC will need additional power supply resources of 625 MW in 2003. The need is further shown by EKPC's plans to construct four new CT electric generating units to provide peaking service alongside their three existing peaker CTs at the J.K. Smith Site. The power generated by the project will be used to support Kentucky's energy needs. Because of DOE's limited role of providing cost-shared funding for the proposed Kentucky Pioneer IGCC Demonstration Project, alternative sites were not considered.

8/22
(cont.)

1/16
(cont.)

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The relatively small amounts and generally widely dispersed nature of MSW in Kentucky does not economically support exclusive utilization of Kentucky-generated MSW to produce RDF supplies. Importing RDF from a densely populated metropolitan area is more economically viable in order to supply the necessary amount of RDF required to operate the plant.

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Wildlife of 366 Old Ruckerville Road

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BIRDS (at feeders) 92 species

Great Blue Heron
Green Heron (4-22) (4-17)
Turkey Vulture
Black Vulture (5-21)
Canada Goose
Wood Duck
Osprey (5-21)
Sharp-shinned Hawk
Red-tailed Hawk
American Kestrel
Wild Turkey
Northern Bobwhite
Killdeer
Solitary Sandpiper (4-23)
American Woodcock (2-25)
Great Horned Owl
Eastern Screech-Owl
Yellow-billed Cuckoo (5-29)(5-6)
Black-billed Cuckoo (5-20)
Common Nighthawk (5-5)
Chimney Swift (4-30) (4-27)
Ruby-throated Hummingbird (4-27) (nest)
Belted Kingfisher
Red-headed Woodpecker
Hairy Woodpecker
Northern Flicker
Pileated Woodpecker
Eastern Wood-Pewee (5-17)
Eastern Phoebe (3-27)(3-4-00)
Eastern Kingbird (4-30) (5-2)
Great Crested Flycatcher (5-22)
Tree Swallow (4-5)(4-6)
Northern Rough-winged Swallow (4-23)
Barn Swallow (4-25)
Blue Jay (nest,00)
American Crow
Carolina Chickadee
Tufted Titmouse
White-breasted Nuthatch
Carolina Wren (nest 99,00)
House Wren (4-25)
Golden-crowned Kinglet
Ruby-crowned Kinglet

Blue-gray Gnatcatcher (4-27) (4-23) (nest)
Eastern Bluebird
American Robin (nest)
Gray Catbird
Northern Mockingbird
Brown Thrasher
European Starling (nest)
Cedar Waxwing
Red-eyed Vireo (5-10)
White-eyed Vireo (4-25)
Tennessee Warbler
Black-throated Green Warbler
Magnolia Warbler
Black-and-white Warbler (4-27)
Palm Warbler (4-29) (5-3)
Prairie Warbler (4-25) (5-3)
Yellow Warbler (5-10) (5-3)
Blackpoll Warbler (5-10)
Morning Warbler (10-4)
Common Yellowthroat (4-27) (4-23)
Yellow-breasted Chat (5-7) (5-1)
Field Sparrow (4-2-00)
Savannah Sparrow
Swamp Sparrow (4-23-00)
Baltimore Oriole (5-2) (nest) (5-3)
Orchard Oriole (5-9)
Eastern Meadowlark
Common Grackle
Brown-headed Cowbird
House Finch
American Goldfinch
Blue Grosbeak
Indigo Bunting (5-2)
Rose-breasted Grosbeak
House Sparrow

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(cont.)

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<u>MAMMALS</u>	18 species	<u>BUTTERFLIES</u>	21 species
Virginia Opossum		Eastern Tiger Swallowtail	
Bat sp.		Zebra Swallowtail	
Man		Black Swallowtail	
Woodchuck		Falcate Orangetip	
Eastern Chipmunk		Cabbage White	
Eastern Gray Squirrel		Orange Sulfur	
Eastern Fox Squirrel		Spring Azure	
White-footed Mouse		Meadow Fritillary	
Deer Mouse		Great Spangled Fritillary	
Domestic Dog		Silvery Checkerspot (5-18)	
Coyote		Question Mark	
Common Gray Fox		Mourning Cloak	
Common Raccoon		Red Admiral	
Mink		Red-spotted Admiral	
Striped Skunk		Hackberry Emperor	
Domestic Cat		Tawny Emperor	
White-tailed Deer		Monarch	
Eastern Cottontail		Little Wood Satyr	
		Silver-spotted Skipper	
		Least Skipper	
		American Snout	
<u>REPTILES</u>	4 species		
Common Snapping Turtle			
Eastern Box Turtle			
Common Garter Snake			
Northern Water Snake			
Eastern Rat Snake			
Milk Snake			
<u>AMPHIBIANS</u>	8 species		
Streamside Salamander			
Southern Two-lined Salamander			
Ravine Salamander			
American Toad (4-19)(4-2-00)			
Cope's Gray Treefrog (5-17)			
Spring Peeper (warm nights all winter)			
Bull Frog (first call: 5-10)			
Green Frog (first call: 5-25)			
<u>FISHES</u>	6 species		
Emerald Shiner			
Creek Chub			
Fathead Minnow			
White Sucker			
Green Sunfish			
Orangethroat Darter			

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(cont.)

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# of Species	
Mammals	18
Birds	92
Reptiles	6
Amphibians	8
Fishes	6
Total Vertebrates	129

Butterflies	21
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Total Species	151
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Trees of 366 Old Ruckerville Road

Slippery Elm 15 species (incomplete)
Black Walnut
Eastern Sycamore
Shellbark Hickory
Chinquapin Oak
Hackberry
Eastern Redcedar
Black Cherry
Silver Maple
Box Elder
Flowering Dogwood
Black Locust
Green Ash

2/08
(cont.)